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*Attorneys for defendant  
United States of America*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

RUGGED OAKS INVESTMENT, LLC,	)	Case No. 2:15-CV-00240-APG-CWH
	)	
Plaintiff,	)	(Removal of Case No. A-15-712268-C
	)	from the District Court of Clark County,
v.	)	Nevada)
	)	
EILEEN NELSON, <i>et al.</i> ,	)	<b>UNITED STATES' MOTION FOR</b>
	)	<b>EXTENSION OF TIME TO ANSWER</b>
Defendants.	)	<b>OR OTHERWISE PLEAD; ORDER</b>
	)	<b>THEREON (Second Request)</b>

The United States of America, through undersigned counsel, respectfully moves this Court for an order extending to May 8, 2015, the time in which it must respond to plaintiff's complaint. In support of its motion, the United States asserts as follows:

1. The United States Attorney for the District of Nevada was served with the summons and complaint in this action on February 3, 2015.

2. On February 11, 2015, this case was timely removed from the District Court of Clark County to this Court.

1           3.       On February 20, 2015, the United States filed a motion requesting that it be given  
2 the normal 60 days from service in which to file an answer or otherwise plead, as permitted  
3 under Fed. R. Civ. P. 12(a)(2); 28 U.S.C. §2410(b). (Doc. 7.) The Court granted that motion on  
4 February 23, 2015. (Doc. 8.)

5           5.       The United States now respectfully requests an additional 30 days in which to  
6 respond, as it has requested, but not yet received, from the Internal Revenue Service the material  
7 necessary to respond to the complaint and defend its interests, as well as obtain the Service's  
8 views on the matter. This motion is not being made for delay, but to permit the United States to  
9 prepare a cogent and accurate response which would advance this litigation.

10          6.       Both the Federal and local civil rules authorize this Court to grant, for good cause,  
11 an extension of time in which to answer or otherwise plead. Fed. R. Civ. P. 6(b); LR 6-1.

12          7.       In moving for an extension of time, the United States does not waive any defenses  
13 listed in Fed. R. Civ. P. 12(h).

1 For these reasons, the United States requests that its motion for an extension of time be  
2 granted, and that it be given until and including May 8, 2015, in which to serve its response to  
3 plaintiff's complaint.

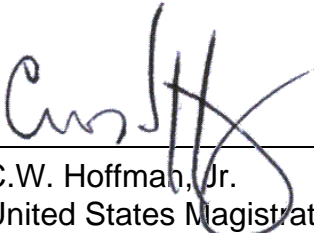
4 Dated: April 8, 2015.

5 Respectfully submitted,

6 CAROLINE D. CIRAULO  
7 Acting Assistant Attorney General

8 /s/ Gerald A. Role  
9 GERALD A. ROLE (IL #6198922)  
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13 IT IS SO ORDERED.

14   
15 \_\_\_\_\_  
16 C.W. Hoffman, Jr.  
17 United States Magistrate Judge  
18 Dated: April 9, 2015  
19  
20  
21  
22  
23

**CERTIFICATE OF SERVICE**

IT IS CERTIFIED that the foregoing was served this 8th day of April, 2015, by filing it with the Court's CM/ECF system, which will electronically transmit copies thereof to:

John P. Aldrich, Esq.  
Stephanie Cooper, Esq.  
John Aldrich Law Firm, Ltd.  
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/s/ Gerald A. Role  
GERALD A. ROLE